



State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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April 24, 1997

Michael R. Brown
Environmental Manager
Continental Lime, Incorporated
3950 South 700 East, Suite 301
Salt Lake City, Utah 84107

Re: Tentative Approval, Revision of Notice of Intention - Large Mining Operations, Continental Lime Inc.(CLI), Cricket Mountain Mine, M/027/006, Millard County, Utah

Dear Mr. Brown:

The Division has completed a review of the additional information provided by CLI in response to our March 7, 1997 letter. The additional information received is as follows: March 19, 1997 letter from SRK on behalf of CLI received March 20, 1997; Attachment A (Draft Environmental Assessment) received March 12, 1997; Attachment B (Reclamation Estimate) received March 19, 1997; Attachment C (Watershed Analysis for Waste Rock Disposal Area #1) received March 12, 1997; Attachment B (Cricket Mountain Vegetation Inventory) received March 12, 1997; April 4, 1997 letter from SRK on behalf of CLI with Drawings 1-1, 1-2, 1-3 and 5-1, received April 7, 1997; Soil Sample Results, received April 9 and April 17, 1997; Continental Lime Revegetation Report, received April 9, 1997; April 16, 1997 Concurrent Reclamation Reports and Status of Concurrent Reclamation, received April 21, 1997; and April 17, 1997 letter from SRK on behalf of CLI providing Additional Information, received by facsimile on April 21, 1997.

After reviewing the additional information the Division is prepared to issue Tentative Approval for this revision to the Cricket Mountain Mine notice of intention. We have a few minor clarifications and concerns which will need to be resolved no later than May 9, 1997. These comments are listed separately under the applicable Minerals Rule. Please format your response in a similar fashion.

We will need two additional documents to present this matter to our Board. 1) A new Reclamation Surety in the amount of \$962,000, or a rider increasing the existing surety by this same amount. 2) A new Reclamation Contract (FORM MR-RC) with the updated information. A copy of FORM MR-RC with guidelines is enclosed for your use. In order to present this matter during the May 28th Board Hearing, we need to receive these reclamation surety documents by May 9th. If possible, we request that a draft copy of these documents be completed and forwarded to our office by May 5th for our review. If you wish to post a *new* surety, please let us know immediately, so that we can send you the proper forms.

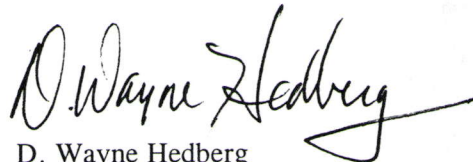
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On April 21, 1997, the Division sent out a Notice of Tentative Decision to Approve of the Revision to CLI's Large Mining Operation. The publication of this notice in the newspapers will begin the Division's formal 30-day public comment period.

Once all remaining technical issues have been sufficiently addressed, the Division will require that one completely revised and updated copy of the permit revision application be provided to our office.

If you have any questions in this regard please contact me, Tony Gallegos, Lynn Kunzler, or Tom Munson of the Minerals Staff. Thank you for your continued patience and cooperation in completing this permitting action.

Sincerely,

A handwritten signature in black ink, reading "D. Wayne Hedberg". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

D. Wayne Hedberg
Permit Supervisor
Minerals Regulatory Program

jb
cc: Ron Tessner, BLM
Steve Herron, SRK
o:\review\m27-06-3.rvw

REVIEW OF REVISION TO LARGE MINING OPERATIONS

Continental Lime, Inc. Company

Cricket Mountain Mine

M/027/006

April 24, 1997

R647-4-105 - Maps, Drawings & Photographs

105.3 Reclamation activities and treatments map

Page 10 of CLI's response refers to modifications to the dialog boxes on drawing 5-1. Please modify all of the dialog boxes on this drawing for the overburden disposal areas and undersize stockpiles to include a more specific description of the reclamation tasks for each of the areas. Include descriptions of the reclamation tasks specific to tops and slopes as applicable.

Differentiate between reclamation tasks for angle of repose slopes and 3h:1v slopes in the descriptions. Replace the term "mulch" with composted manure as applicable. Change soil cover depths from four inches to six inches where appropriate. (AAG)

R647-4-106 - Operation Plan

106.3 Estimated acreages disturbed, reclaimed.

Page 2-2 text of the draft EA and table 2.1 describes the disturbance for the BB Dolomite Quarry as totaling 102 acres. Table A of the CLI response lists a total for this feature of 94.1 acres. Page 2-3, Table 2.1 of the draft EA lists the disturbed acreage for the Existing Poison Mountain Area Undersize Material Stockpile as 10.8 acres with a superscript note of 2. Table A of the CLI response lists the acreage for this feature as 4.1 acres. Please explain these conflicting figures and provide a revised table of disturbed areas. (AAG)

Page 2-7 of the draft EA states disposal area #3 may be mined as an extension of the North Lobe Quarry. This mining would increase the size of the North Lobe Quarry by 7.1 acres (2.4 acres of private plus 4.7 acres of BLM surface disturbance). Table A in the CLI response gives a total disturbance for this potential expansion of 2.3 acres (1.4 acres private and 0.9 acres BLM). Please explain these conflicting figures and revise Table A if needed. (AAG)

The April 17, 1997 letter from SRK has clarified that Table A attached to the March 18, 1997 memo contains the correct acreage information. This has resolved the two comments listed under this section heading. (AAG)

106.7 Existing vegetation - species and amount

A review of the existing vegetation data from the site indicates that the vegetation cover can vary from 10 - 40%. Given this variability, it is unclear where the vegetation cover for the proposed disturbed area(s) falls within this range (probably varies to some extent). The Division will conduct an onsite inspection by mid May, 1997 to verify the percentage of ground cover for the proposed disturbed area. This will complete this section. (LK)

R647-4-107 - Operation Practices

107.6 Concurrent reclamation

Revegetation test plots have been proposed to determine the type(s) and rate(s) of soil amendments needed for substitute soil materials (fines). The Division requests that 'as-built' designs be submitted with the annual report, which shows location of testplots, and the various parameters being tested. (LK)

109.2 Impacts to threatened & endangered wildlife/habitat

The Division is still waiting for a copy of the final results of the prairie dog survey being prepared by the U.S. Fish and Wildlife Service. Once received, this section will be complete. (LK)

R647-4-110 - Reclamation Plan

110.2 Roads, highwalls, slopes, drainages, pits, etc. reclaimed.

Page 2-15 of the draft EA under the heading of "2.6.5 Site Specific Closure and Reclamation, 2.6.6.1 Quarries" describes management of unstable quarry slopes. The EA states: "The slopes of visibly unstable areas or areas showing significant deterioration would be managed through selective blasting or other methods to mitigate safety hazards." The Division will also include these measures in the final reclamation description. (AAG)

R647-4-112 - Variance

The Division will allow bench faces at the BB Dolomite Quarry, Flat Iron Quarry, and North Lobe Quarry to remain at angles steeper than 45 degrees after final reclamation. A variance from rule R647-4-111.7 is not required because the overall pit slope angle for these quarries will be 18 to 20 degrees. (AAG)

Approximately 78,000 cubic yards of topsoil will be salvaged and stockpiled. This material will be used on those areas with the greatest potential for revegetation. A minimum of 6 inches of fines will be used and amended on the pit benches. No soil material will be used on the angle of repose waste rock slopes. The Division concurs that this is the best use of soil resources and, therefore, grants a variance to R647-4-111.12. (LK)

Because of the lack of soil resources for reclamation, the Division concurs that the revegetation standard for areas that do not receive topsoil should be reduced. CLI has proposed an alternate standard of 50% of the pre-mining vegetation cover. The Division finds this alternative acceptable and grants a variance from R647-4-111.13 for those areas not receiving topsoil. (LK)

R647-4-113 - Surety

Page 12 of the CLI response refers to the current estimated cost for reclamation of the Poison Mountain Crusher Area as \$72,787. This section of the letter describes an adjustment due to the overlap of this crusher area by the existing reclamation estimate and this latest estimate. The letter reduces the \$72,787 figure by the \$28,620 to an adjusted amount of \$44,167. The \$28,620 amount was taken from the 4/14/92 reclamation estimate in section 5.2 under the heading of Crusher Site Reclamation. Page 51 of the recent reclamation estimate lists reclamation of this area at \$22,888. Portions of the Poison Mountain Crusher Area were included in the previous reclamation estimate and, therefore, an adjustment in the surety amount is needed; however, the Division has been unable to find figures to support the adjusted amount presented. The difference may be due to the costs for demolition of structures and debris removal specific to the Poison Mountain Quarry crusher area which are not easily identifiable in the current estimate. Please explain what is included in the \$72,787 figure and where the supporting figures in the estimate are listed. (AAG)

The surety amount currently proposed by CLI is \$907,955 in 1997 dollars. The Division has added five years of escalation at the rate of 2.52% per year to reflect costs in 2002 dollars. Rounding the year 2002 amount to the nearest one thousand dollars gives a total surety amount of \$1,028,000. With the exception of adjustments to the current reclamation estimate due to issues raised in this review, the amount of reclamation surety requested by the Division will be \$1,028,000. (AAG)

The April 17, 1997 SRK letter has provided some additional information describing the reclamation costs for the Poison Mountain Crusher Area and the Poison Mountain Undersize Pile. The Division is in agreement with reducing the proposed surety by the amount of \$58,910 for these two areas which are included in the existing bond. Using this information the Division has calculated a new reclamation estimate in terms of year 2002 dollars.

<i>Surety amount for revision proposed by CLI</i>	<i>=</i>	<i>\$907,955</i>
<i>less amount of surety overlap</i>	<i>=</i>	<i>\$58,910</i>
<i>adjusted total surety in 1997-\$</i>	<i>=</i>	<i>\$849,045</i>
 <i>new total after adding 5 yrs escalation at 2.52%</i>	 <i>=</i>	 <i>\$961,554</i>
 <i>rounding total to nearest \$1,000</i>	 <i>=</i>	 <i>\$962,000</i>

The Division requests that a surety amount of \$962,000 (2002-\$) be posted by CLI for this revision to the large mining operation notice of intention. (AAG)

SUMMARY OF RECLAMATION PLAN BY AREA

last revision April 21, 1997

Overburden Disposal Areas #1, #2, #3, #4 (67 acres)

Dump tops to receive 6 inches of topsoil, seed & amendments.

Slopes to remain at angle of repose & receive seed.

Angle of repose slopes granted a variance from 70% of pre-existing cover revegetation standard.

Alternate success standard of 50% of pre-existing cover on angle of repose slopes established until test plot data supports other standard.

Poison Mtn. Undersize Stockpile (existing stockpile expanded by 4.1 acres)

Top to receive 6 inches of topsoil, seed & amendments

All slopes to be regraded to 3H:1V, receive 6 inches of topsoil, seed & amendments

BB Dolomite Undersize Stockpile (29.5 acres)

Top to receive 1 foot of topsoil, seed & amendments

North & west slopes regraded to 3H:1V.

North & west slopes to receive 1 foot of topsoil, seed & amendments

South & east sides are at grade & will receive seed & amendments. A variance from the 70% of pre-existing cover revegetation standard is implied since topsoil will be placed on these slopes.

BB Dolomite Quarry (51.6 acres), Flat Iron Quarry (63.1 acres), North Lobe Quarry (33.5 acres)

Benches covered with 6 inches of fines & ripped.

Bench area estimated as 85% of quarry footprint.

Benches to receive seed & amendments.

Bench faces will be allowed to remain at angles steeper than 45 degrees. The overall pit slope angles will range from 18 to 20 degrees.

Boulders placed to control public access.

Unstable highwall areas will be managed to mitigate safety hazards.

Roads within quarry excavations in bedrock will be left unreclaimed.

Bench areas granted variance from 70% of pre-existing cover revegetation standard. Alternate success standard of 50% of pre-existing cover on benches established until test plot data supports other standard.

Poison Mtn. Crusher & Facilities (no increase in existing 17 acres)

All structures removed or demolished. Demolition debris removed from site.

Concrete walls/footings above grade demolished & removed from site.

Concrete foundations below grade broken up & buried onsite.

Affected areas will receive 6 inches or 1 foot of topsoil, seed & amendments.

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BB Dolomite Crusher & Facilities (2.4 acres)

All structures removed or demolished. Demolition debris removed from site.
Concrete walls/footings above grade demolished & removed from site.
Concrete foundations below grade broken up & buried onsite.
Affected area will receive 4 inches of topsoil, seed & amendments.

Roads in West Quarry & BB Dolomite Areas (19.4 acres)

Roads recontoured & ripped.
Roads to receive 6 inches of topsoil, seed & amendments.

Haul Road from Quarry Switchback to Processing Plant

This section of road allowed to remain unreclaimed under a previous variance which was granted.

Topsoil Stockpiles (5.2 acres)

Stockpile areas regraded & ripped.
Stockpile areas to receive seed & amendments.

Amendments = ammonium nitrate (100 lb/acre) + single super phosphate (100 lb/acre) +
composted manure (3 tons/acre).